

REMARKS/ARGUMENTS

The Examiner has reiterated and made final the rejections of all of the claims currently on file in view of the Martinez reference (U.S. 2002/0142792 A1) on the grounds that the limitation "location parameter" allegedly reads on the detecting of movement from a public network to a private network as described in paragraph [0022] of Martinez. With great respect, the expression "location parameter", as this would be understood by a person of ordinary skill in the art, would not include the detection of movement from a public network to a private network or from a private network to a public network. A "location parameter", as this expression is used throughout the present specification, and as this would be understood by a person of ordinary skill in the art, means an actual specific geographical location that is estimated using technologies such as global positioning system (GPS) and or triangulation of signals from nearby base stations. Both of these techniques provide estimations of the specific location of the mobile device. This "location parameter", as this term is used, therefore does not read on network awareness i.e. movement from one network to another network such as from a public to a private network. Since network awareness and the determination of location are believed to be separate and distinct concepts, it is respectfully submitted that paragraph [0022] of Martinez does not read upon the claim limitation "location parameter".

In view of the foregoing argument, it is respectfully requested that the claim rejections be withdrawn and that a Notice of Allowance be issued. In the event that a Notice of Allowance is not issued, applicant respectfully requests the issuance of an Advisory Action.

Respectfully submitted,
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